

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

	X	
	)	
GENOA COLOR TECHNOLOGIES, LTD.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
MITSUBISHI ELECTRIC CORP.; MITSUBISHI	)	Civil Action No. 07-CIV-6233 (PKC)
ELECTRIC US HOLDINGS, INC.; MITSUBISHI	)	
ELECTRIC AND ELECTRONICS USA, INC.;	)	
MITSUBISHI DIGITAL ELECTRONICS	)	
AMERICA, INC.; SAMSUNG ELECTRONICS CO.,	)	
LTD.; SAMSUNG ELECTRONICS AMERICA,	)	
INC.,	)	
	)	
Defendants.	)	
	)	
	X	

**DECLARATION OF BRIAN G. BIELUCH IN SUPPORT OF  
DEFENDANTS' JOINT CLAIM CONSTRUCTION BRIEF**

I, Brian G. Bieluch, declare as follows:

1. I am an associate in the law firm of Covington & Burling LLP. The following facts are within my personal knowledge and, if called and sworn as a witness, I could and would testify competently to them. I submit this declaration in support of Defendants' Joint Claim Construction Brief.

2. Attached hereto as Exhibit A is a true and correct copy of U.S. Patent No. 7,113,152 ("152 patent").

3. Attached hereto as Exhibit B is a true and correct copy of an order from the U.S. Patent and Trademark Office granting a request filed by Mitsubishi Electric Corp. and Mitsubishi Digital Electronics America, Inc., for *inter partes* reexamination of claims 1-10 of the '152 patent.

4. Attached hereto as Exhibit C is a true and correct copy of an order from the U.S. Patent and Trademark Office granting a request filed by Samsung Electronics Co., Ltd., for *inter partes* reexamination of claims 1-10 of the '152 patent.

5. Attached hereto as Exhibit D is a true and correct copy of an order from the U.S. Patent and Trademark Office granting a request filed by Texas Instruments Inc., for *inter partes* reexamination of claims 1-10 of the '152 patent.

6. Attached hereto as Exhibit E is a true and correct copy of an excerpt from *Webster's New World Dictionary* (2d College ed. 1980), and a true and correct copy of an excerpt from *Merriam-Webster's Collegiate Dictionary* (10th ed. 2000).

7. Attached hereto as Exhibit F is a true and correct copy of Provisional Patent Application No. 60/209,771, filed on June 7, 2000.

8. Attached hereto as Exhibit G is a true and correct copy of an excerpt of the file history of the '152 patent.

9. Attached hereto as Exhibit H is a true and correct copy of Takeyuki Ajito, et al., *Expanded Color Gamut Reproduced by Six-Primary Projection Display*, 3954 Proceedings of SPIE 130 (2000).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 23, 2008, at Washington, DC.

By: 

Brian G. Bieluch